

EXHIBIT

“A”

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:
Date Purchased:

-----X
SANDRA OSUNA,

Plaintiff,

vs.

FEDEX GROUND and "JOHN DOE," a fictitious
name/person intended to be the unknown operator of a
subject vehicle and

Defendants.

SUMMONS

Plaintiff designates Queens
County as the place of trial.

The basis of venue is
Place of incident.


Incident occurred at:
County of Queens, State of
New York.

-----X County of Queens.

To the above-named Defendants:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Queens, New York
March 05, 2021



Boris Raytsin, Esq.
RAYTSIN LAW FIRM, P.C.
Attorneys for Plaintiff
SANDRA OSUNA,
221-10 Jamaica Ave. Suite 106
Queens Village, NY 11428
(718) 355-9797
Our File No.

TO:

FEDEX GROUND

1 Cherry Hill

Suite 630

Cherry Hill, NJ 08002

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:
Date Purchased:

-----X
SANDRA OSUNA,

VERIFIED COMPLAINT

Plaintiff,

vs.

“JOHN DOE,” a fictitious name/person intended to be the
unknown operator of a subject vehicle and FEDEX
GROUND,

Defendants.
-----X

Plaintiff, by attorneys, **RAYTSIN LAW FIRM, P.C.**, complaining of the Defendants,
respectfully alleges, upon information and belief:

**AS AND FOR A FIRST CAUSE OF ACTION
ON BEHALF OF PLAINTIFF: SANDRA OSUNA**

1. At all times herein mentioned, Plaintiff, SANDRA OSUNA, was and still is a resident of the County of Queens and State of New York.
2. At all times herein mentioned, Defendant FEDEX GROUND was, and still is, operating at the County of Queens, State of New York.
3. At all times herein mentioned, Defendant FEDEX GROUND was the owner of a motor vehicle whose registration no. is unknown at this stage.
4. At all times herein mentioned, Defendant “JOHN DOE” operated the aforementioned motor vehicle whose registration no. is unknown at this stage.

5. At all times herein mentioned, Defendant "JOHN DOE" operator of the aforesaid motor vehicle with the consent and permission of the defendant employer FEDEX GROUND.

6. At all times herein mentioned, Defendant "JOHN DOE" operated the aforesaid motor vehicle in the course of employment with the Defendant FEDEX GROUND.

7. At all times herein mentioned, Defendant "JOHN DOE" managed the aforesaid motor vehicle.

8. At all times herein mentioned, Defendant "JOHN DOE" maintained the aforementioned motor vehicle.

9. At all times herein mentioned, Defendant "JOHN DOE" controlled the aforementioned motor vehicle.

10. At all times herein mentioned, Defendant FEDEX GROUND managed the aforementioned motor vehicle.

11. At all times herein mentioned, Defendant FEDEX GROUND maintained the aforementioned motor vehicle.

12. At all times herein mentioned, Defendant FEDEX GROUND controlled the aforementioned motor vehicle.

13. At all times herein mentioned, Plaintiff was the operator of a motor vehicle bearing New Jersey State registration number 685443R.

14. At all times herein mentioned, in the County of Queens, State of New York, intersection of 118 Avenue and 199 Street, were public roadways, streets and/or thoroughfares.

15. That on 02nd day of August 2020, Defendant “JOHN DOE” was operating the vehicle owned by FEDEX GROUND, at the aforementioned location.

16. That on 02nd day of August 2020, Plaintiff was operating a motor vehicle at the aforementioned location.

17. That on 02nd day of August 2020, at the aforementioned location, the motor vehicle owned by Defendant FEDEX GROUND and operated by Defendant “JOHN DOE” came into contact with a vehicle operated by Plaintiff.

18. That as a result of the aforesaid contact, Plaintiff was injured.

19. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

20. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendants were otherwise negligent, careless and reckless under the circumstances then and there prevailing.

21. That by reason of the foregoing, Plaintiff sustained severe and permanent personal injuries; and Plaintiff was otherwise damaged.

22. That Plaintiff sustained serious injuries as defined by §5102(d) of the Insurance Law of the State of New York.

23. That Plaintiff sustained serious injuries and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

**AS AND FOR A SECOND CAUSE OF ACTION
ON BEHALF OF PLAINTIFF: SANDRA OSUNA**

24. This plaintiff repeats, reiterates, and re-alleges each and every allegation contained in paragraphs of the Complaint designated “1st” through “23rd,” inclusive with the same force and effect as though said paragraphs were more fully and completely set forth herein at length.

25. That Plaintiff is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. Plaintiff is seeking only to recover those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

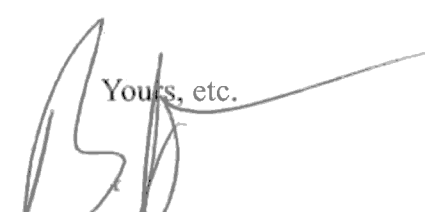
26. That this action falls within one or more of the exceptions set forth in CPLR §1602, including but not limited to §1602 (6) & (7).

27. That by reason of the foregoing, Plaintiff has been damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff(s) demand(s) judgment against the Defendants herein, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Queens, New York
March 05, 2021

Yours, etc.



Boris Raytsin, Esq.
RAYTSIN LAW FIRM, P.C.
Attorneys for Plaintiff
SANDRA OSUNA,

221-10 Jamaica Ave. Suite 106
Queens Village, NY 11428
(718) 355-9797
Our File No

INDIVIDUAL VERIFICATION

STATE OF NEW YORK]

] ss:

COUNTY OF QUEENS]

Sandra Osuna, being duly sworn, deposes and says:

That I am the Plaintiff in the action within action; that I have read the foregoing **COMPLAINT**, and know the contents thereof; that the same is true to my own knowledge except as to the matters therein stated to be alleged upon information and belief, and as to those matters I believe it to be true.

Sandra Osuna

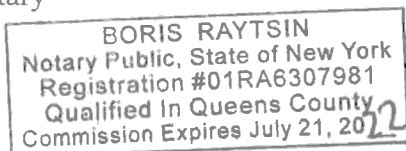
Sandra Osuna

Sworn to before me on

5th day of *May* 20 *21*

B. Raytsin

Notary



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